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AUG 07 2010

LXN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

KAREN LAUREANO,

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

Shannon McFadden, being duly sworn, deposes and states that she is a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about August 6, 2010, within the Eastern District of New York and elsewhere, the defendant KAREN LAUREANO did knowingly and intentionally import one or more controlled substances into the United States from a place outside thereof, which offense involved (a) 100 grams or more of a substance containing heroin, a Schedule I controlled substance and (b) 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for her belief are as follows:^{1/}

1. On or about August 5, 2010, the defendant KAREN LAUREANO arrived at JFK International Airport in Queens, New York ("JFK") aboard Jet Blue flight No. 810 originating from Santo Domingo, Dominican Republic.

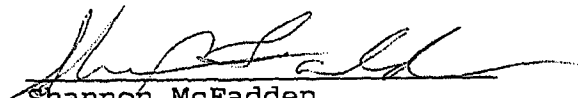
2. During the course of a routine customs examination, a Customs and Border Protection ("CBP") officer noticed that the defendant appeared very nervous and was wearing oversized clothing. CBP officers performed a pat down search and detected hard objects around the defendant's mid-section. CBP officers then performed a partial body search which revealed that the defendant was wearing a diaper-like contraption containing packages and pellets taped to her body.

3. The packages field-tested positive for the presence of cocaine and the total approximate gross weight was 2215.9 grams. The pellets field-tested positive for the presence of heroin and the total approximate gross weight was 139.1 grams.

4. The defendant waived her Miranda rights and admitted in sum and substance that she knew that she was carrying narcotics into the United States.

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant KAREN LAUREANO be dealt with according to law.


Shannon McFadden
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
7th day of August, 2010

/s/ William D. Wall


UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK